

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PROMEDEV, LLC dba RELIEF FACTOR,

Plaintiff,

v.

AGE RELIEF, LLC; and MICHAEL JOSEPH
REDMOND,

Defendants.

CASE NO. 2:22-cv-01824-RSM

**FOURTH STIPULATION AND ORDER
TO EXTEND TIME TO RESPOND TO
COMPLAINT**

Plaintiff Promedev, LLC dba Relief Factor (“Plaintiff”) and defendants Age Relief, LLC and Michael Joseph Redmond (“Defendants”) (collectively, the “Parties”), by and through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its Complaint on December 28, 2022;

WHEREAS, on February 23, 2023, the Court granted the Parties’ Third Stipulation and Order to Extend Time to Respond to Plaintiff’s Complaint [Dkt. # 13];

WHEREAS, Defendants’ response to Plaintiff’s complaint is due on March 17, 2023;

WHEREAS, the Parties have been working cooperatively regarding the early stages of the litigation, continue to be engaged in substantial discussions of the matters at issue in this dispute, and have commenced meaningful settlement discussions and exchanges;

WHEREAS, Defendant’s lead counsel, Mr. Kit Roth, on behalf of Defendant, has been uniquely engaged with Plaintiff’s counsel on meaningful settlement discussions and exchanges;

1 WHEREAS, Mr. Roth is currently on bereavement leave because, last week, Mr. Kit
2 Roth's mother recently passed away suddenly and unexpectedly,

3 WHEREAS, to facilitate the Parties' ongoing settlement discussions and allow Mr. Roth
4 bereavement time, the Parties agree to extend the deadline by which Defendants may respond to
5 the Complaint to March 31, 2023;

6 WHEREFORE, IT IS HEREBY STIPULATED AND AGREED TO BY THE PARTIES,
7 that Defendants may have until March 31, 2023 to file and serve a response to the Complaint.

8 RESPECTFULLY SUBMITTED on this 13th day of March, 2023.
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/s/Kit W. Roth

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Attorneys for Plaintiff

ORDER

Pursuant to the above stipulation, **IT IS SO ORDERED.**

DATED this 13th day of March, 2023.

A handwritten signature in black ink, appearing to read 'R. Martinez', is written over a horizontal line.

RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE